

United States District Court
for the

WESTERN

DISTRICT OF

OKLAHOMA

United States of America

v.

Isaac Giovanni Romero-Betran,

)
)
)
)
)

Case No: MJ-25-96-CMS

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of December 20, 2024, in the Western District of Oklahoma, the defendant violated:

Code Section

8 U.S.C. § 1326(a)

Offense Description

Reentry of removed alien

This criminal complaint is based on these facts:

See attached Affidavit of Deportation Officer Curtis Fair, Immigration and Customs Enforcement, which is incorporated and made a part hereof by reference.

☒ Continued on the attached sheet.



Complainant's signature

Curtis Fair
Deportation Officer
Immigration and Customs Enforcement

Sworn to before me and signed in my presence.

Date: February 7, 2025

City and State: Oklahoma City, Oklahoma



Judge's signature

Chris M. Stephens, U.S. Magistrate Judge
Printed name and title

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA)
)
COUNTY OF OKLAHOMA)

AFFIDAVIT

I, Curtis Fair, being duly sworn, depose and state as follows:

1. I have been employed as a Deportation Officer with the United States Department of Homeland Security, Immigration and Customs Enforcement (ICE), since June 2017. I graduated from the United States Border Patrol Academy in October 2007. Prior to becoming a Deportation Officer, I was a Border Patrol Agent from June 2007 to June 2017.

2. As a Deportation Officer currently assigned to ICE's Oklahoma City office for Enforcement Removal Operations (ERO), I interview and investigate detained individuals to determine whether they have legal status to enter or remain in the United States. I am vested with the authority to investigate and arrest persons for violations of Title 8 of the United States Code.

3. The information contained in this Affidavit is submitted for the limited purpose of establishing probable cause that **ISAAC GIOVANNI ROMERO-BETRAN** was found in the United States in violation of 8 U.S.C. § 1326(a).

4. On December 20, 2024, **ISAAC GIOVANNI ROMERO-BETRAN** was encountered by a Deportation Officer while in custody at the Woodward County Jail in

Woodward, Oklahoma, in the Western District of Oklahoma. On December 20, 2024, after reviewing data on **ISAAC GIOVANNI ROMERO-BETRAN**, a deportation officer determined that he is an alien unlawfully present in the United States and that he is not a United States citizen; he is a citizen of Mexico.

5. **ISAAC GIOVANNI ROMERO-BETRAN**'s fingerprints were collected, and photographs were recorded electronically using live-scan technology and submitted to both the Department of Justice's Integrated Automated Fingerprint Identification System (IAFIS) database and the Department of Homeland Security's Automated Biometric Identification System (IDENT) database. Both databases identified **ISAAC GIOVANNI ROMERO-BETRAN** as being assigned Federal Bureau of Investigation number **275087MD0** and Department of Homeland Security FINS number **1052166900**. These identification numbers are associated solely with **ISAAC GIOVANNI ROMERO-BETRAN** and correlate to his Alien Registration Number, A205 517 967. A check of records confirmed **ISAAC GIOVANNI ROMERO-BETRAN**'s identity and confirmed he is an alien who was previously removed from the United States to Mexico on November 1, 2012, and July 25, 2023.

6. Further checks did not indicate that **ISAAC GIOVANNI ROMERO-BETRAN** had applied for or received permission to reenter the United States from the United States Secretary of Homeland Security or the United States Attorney General since his latest deportation. If **ISAAC GIOVANNI ROMERO-BETRAN** had applied for or

received this permission, there would be a record of it in his Administrative File (A-File) and Department of Homeland Security databases. Because **ISAAC GIOVANNI ROMERO-BETRAN** was previously removed, he knowingly came back to the United States without proper authorization.

7. Based on the foregoing, I respectfully submit that there is probable cause to believe that **ISAAC GIOVANNI ROMERO-BETRAN** has committed the federal crime of Reentry of a Removed Alien, a violation of 8 U.S.C. § 1326(a).

FURTHER, YOUR AFFIANT SAYETH NOT.



Curtis Fair
Deportation Officer
Immigration and Customs Enforcement
Department of Homeland Security

Sworn to and subscribed before me on February 7, 2025.



CHRIS M. STEPHENS
United States Magistrate Judge